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February 25, 2011

Hon. Paul G. Gardephe, USDJ  
United States District Court  
500 Pearl Street  
New York, NY 10007

Re: Dawson v. City of New York, et al.  
Dkt. no. 09-civ-5348 (PGG)

Honorable Sir:

I write on behalf of all parties to request a four month extension from the date of this letter for the completion of discovery. A letter from Basil C. Sitaris, who was the Assistant Corporation Counsel assigned the case, dated August 2, 2010 indicates that the extension sought in that letter was the third, making this the fourth extension requested.

Mr. Sitaris wrote that letter on the eve of his leaving the New York City Law Department. Your Honor granted an extension until October 31, 2010 for the completion of discovery. In the mean time, I broke my ankle on September 30, 2010, and was out of commission for the next several months, unable to travel to my office and spending most of my time and energy healing from the fracture and an attendant surgery.

Upon my recent return to my office, I made efforts to determine who had been assigned the case, and only a few days ago, made contact with Mr. Isaac Kletfish, Asst. Corp. Counsel, who had inadvertently not filed a notice of appearance. Given that Mr. Kletfish is new to the case, and that I need to catch up on my entire docket, a four month extension is requested so that we can bring the case to readiness for motions or trial.

Respectfully submitted,

*Aaron David Frishberg*

**MEMO ENDORSED**

Aaron David Frishberg  
Attorney for Plaintiff

The Application is granted. A status conference in this case will take place on

SO ORDERED:

*Paul G. Gardephe*  
Paul G. Gardephe, U.S.D.J.

June 3, 2011 at  
11:00 A.M.

Dated: March 3, 2011

cc: Isaac Kletfish, Asst. Corp. Counsel

USDC SDNY
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